

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
PETER ENEA, VICTOR MCLEAN,	:	
CHANTAY DINGLE-EL, KENNY ALTIDOR,	:	
individually and on behalf of others similarly	:	
situated,	:	
	:	Case No. 12-cv-4656 (GBD)
Plaintiffs,	:	
	:	
-against-	:	
	:	
BLOOMBERG L.P.,	:	
	:	
Defendant.	:	
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DECLARATION OF THOMAS H. GOLDEN IN OPPOSITION TO PLAINTIFFS’
MOTION FOR CLASS CERTIFICATION

THOMAS H. GOLDEN declares as follows:

1. I am a member of the bar of this Court and of Willkie Farr & Gallagher LLP, attorneys for Defendant Bloomberg L.P. (“Bloomberg”). I submit this declaration in opposition to Plaintiffs’ Motion to Certify a Class and Approve Class and Collective Action Notice.

2. Attached as Exhibit A is a true and correct copy of a Performance Evaluation for Peter Enea with respect to his performance in 2008.

3. Attached as Exhibit B is a true and correct copy of a Performance Evaluation for Victor McLean with respect to his performance in 2009.

4. Attached as Exhibit C is a true and correct copy of a Performance Evaluation for Victor McLean with respect to his performance in 2010.

5. Attached as Exhibit D is a true and correct copy of a Performance Evaluation for Chantay Dingle-El with respect to her performance in 2009.

6. Attached as Exhibit E is a true and correct copy of a Performance Evaluation for Kenny Altidor with respect to his performance from October 2006 to October 2007.

7. Attached as Exhibit F is a true and correct copy of a Performance Evaluation for Chantay Dingle-El with respect to her performance in 2010.

8. Attached as Exhibit G is a true and correct copy of a Performance Evaluation for Peter Enea with respect to his performance in 2009.

9. Attached as Exhibit H is a true and correct copy of a Performance Evaluation for Kenny Altidor with respect to his performance in 2010.

10. Attached as Exhibit I is a true and correct copy of a Performance Evaluation for Chantay Dingle-El with respect to her performance in 2011.

11. Attached as Exhibit J is a true and correct copy of a Performance Evaluation for Peter Enea with respect to his performance from February 2007 to February 2008.

12. Attached as Exhibit K is a true and correct copy of the transcript of the hearing held in this case on August 7, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 20, 2012
New York, New York

/s/ Thomas H. Golden
Thomas H. Golden